

Consumers Union

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May 23, 2003

Richard Matthews, Program Manager
National Organic Program,
USDA-AMS-TMP-NOP
1400 Independence Ave, S.W.
Room 4008 – So., Ag. Stop 0268
Washington, D.C., 20250
fax 202.205.7808

RE: Docket Number TMD-03-02
FR 27941, V.68, No. 99, Thursday, May 22, 2003
**National Organic Program; Proposed Amendments to the
National List of Allowed and Prohibited Substances**

Dear Mr. Matthews:

Consumers Union requests an extension to the deadline for comments to this Proposed Rule amending Section 205.605 of the National List. A 10-day comment period, especially over a holiday weekend, provides too short a time for the preparation of substantive comments. The USDA has not even listed this Federal Register notice on the NOP website as of noon on May 23, 2003. We request the extension to June 23, 2003 – a reasonable 30-day comment period.

We note that while this notice refers to eight other previously-published notices regarding the NOSB deliberations on these substances, this proposal *does not follow the NOSB recommendations* of these materials. Therefore, wholly new substantive review and comment is necessary.

In addition, this 10-day public comment period allows little opportunity for those without computers and internet access to become aware of the Docket, much less compile detailed comments. We must not forget that there is a large segment of the population that does not have daily access to the internet. We refer your attention to a recent Organic Farming Research Foundation survey with 1000 organic farmer respondents which found that 22% of those responding had no internet access whatsoever.

By using the internet as the *sole* method of informing the public, rural and under-resourced populations have been left out of the process altogether. The 10-day comment period prevents the full public from having adequate opportunity to comment – there is simply not enough time.

Finally, we request that the National Organic Program institute a policy of 30-day absolute minimum for all public comment periods (including Federal Register notices as well as other policy proposals).

Thank you

A handwritten signature in black ink that reads "Urvashi Rangan, Ph.D." The signature is written in a cursive, flowing style.

Urvashi Rangan, Ph.D.
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